

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

LAURA MONTERROSA-FLORES,	§	
	§	
Plaintiff-Petitioner,	§	
	§	
v.	§	Case No. 1:18-cv-192
	§	
DANIEL BIBLE, San Antonio	§	
Field Office Director, Office of	§	
Enforcement and Removal Operations,	§	
United States Immigration and	§	
Customs Enforcement;	§	
CHARLOTTE COLLINS, Warden,	§	
T. Don Hutto Residential Center,	§	
	§	
Defendants-Respondents,	§	
	§	
THE UNITED STATES	§	
IMMIGRATION AND	§	
CUSTOMS ENFORCEMENT;	§	
LYNDA M. PARKER	§	
	§	
Defendants.	§	

**PLAINTIFF-PETITIONER’S MOTION FOR
PRELIMINARY INJUNCTION**

Plaintiff-Petitioner Laura Monterrosa-Flores (“Ms. Monterrosa-Flores”) respectfully moves for a preliminary injunction pursuant to Federal Rule of Civil Procedure 65 to require Defendant-Respondent Daniel Bible, San Antonio Field Office Director, Office of Enforcement and Removal Operations, United States Immigration and Customs Enforcement (“Defendant Bible”) and Defendant-Respondent Charlotte Collins, Warden, T. Don Hutto Residential Center (“Defendant Collins”) (1) to provide immediately Petitioner with a full psychiatric evaluation

and psychiatric treatment, including medication and placement in inpatient treatment as needed, to treat Ms. Monterrosa-Flores's mental-health needs and (2) to enjoin Defendant Bible and Defendant Collins and their employees and agents from placing Ms. Monterrosa-Flores in solitary confinement, whether through segregation and isolation, or otherwise.

Ms. Monterrosa-Flores asserts: (1) there is a substantial likelihood that she will prevail on the merits of her claims; (2) there is a substantial threat that she will be irreparably harmed if the injunction is not granted; (3) the threatened injury to Ms. Monterrosa-Flores outweighs the threatened harm to Defendant Bible and Defendant Collins; and (4) granting the injunction will not disserve the public interest.

In support of this application, Ms. Monterrosa-Flores relies upon and incorporates herein her Petition for Writ of Habeas Corpus and Complaint; her Memorandum of Law in Support of Plaintiff-Petitioner's Petition For Writ of Habeas Corpus and Alternative Emergency Application for Temporary Restraining Order, including exhibits which are filed under seal; and Ms. Monterrosa-Flores's proposed order granting the requested injunctive relief.

Dated: March 5, 2018

Respectfully submitted,

/s/ Jack Salmon
Celina Moreno
Jack Salmon
Fatima Menendez*
Mexican American Legal Defense
and Educational Fund (MALDEF)
110 Broadway, Suite 300
San Antonio, TX 78205
(210) 224-5476
(210) 224-5382 – FAX
*Pro Hac Vice

ATTORNEYS FOR PLAINTIFF-PETITIONER
LAURA MONTERROSA-FLORES

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that he has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 5th day of March, 2018. The undersigned counsel further certifies that he sent a copy of the above and foregoing by electronic mail to counsel for Defendants-Respondents:

John Locurto
john.locurto@usdoj.gov
Office of the United States Attorney
for the Western District of Texas
601 N.W. Loop 410, Suite 600
San Antonio, Texas 78216-5597

/s/ Jack Salmon
Jack Salmon

CERTIFICATE OF CONFERENCE

On the 5th day of March, 2018, the undersigned counsel for Plaintiff-Petitioner telephoned Defendants-Respondents counsel at the Office of the United States Attorney for the Western District of Texas and spoke with a supervising attorney in the civil division, John Locurto. Mr. Locurto indicated that Defendants-Respondents are opposed to this motion.

/s/ Jack Salmon
Jack Salmon